

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:24-CR-42

STEVEN DAVID SEEGER,

Defendant.

UNITED STATES' MOTION IN LIMINE TO PROTECT IDENTITY OF VICTIMS

The United States of America, by Bernard J. Bernard, Acting United States Attorney, and Kimberley Crockett, Assistant United States Attorney, provides this brief supporting the Government's Motion in Limine to preclude the Defendant from referring to the victims by name.

The Government now seeks an Order to ensure that the victim's identity is protected in filings and proceedings; at trial (in opening statements and closing arguments; testimony that is offered and elicited; and any trial objections and mid-trial motion practice); and after trial, by protecting their identity in the transcript of all pretrial and trial proceedings.

The Child Victims' and Child Witnesses' Rights Act provides for privacy protection of minor victims of the crimes charged in this case. See 18 U.S.C. §§ 3509(a)(2)(A), 3509(d). The statute allows for orders protecting a child from public disclosure of the name of or any other information concerning the child during the proceedings, if the court determines that there is a significant possibility that such disclosure would be detrimental to the child. § 3509(d)(3)(A). The statute empowers a court to provide for any ... measures that may be necessary to protect the privacy of the child.

To make the minor victims' identities public and create a public record of their

victimization by the Defendant will most certainly be to their immediate and lasting detriment, will cause lasting harm, and may impact their ability to testify at trial. Therefore, the Government requests that:

- in any court filing that the minors continued to be referred to as Jane Doe 1 or P.G. and Jane Doe 2 or K.S.
- that the minor victims' first and last names are not use at during any court proceedings;
- that any trial transcript refer to victims as Jane Doe 1 and 2, or by their initials only.

The granted a similar motion at the pre-trial and the Government asked that the ruling continued through any remaining proceedings.

UNITED STATES OF AMERICA

RANDOLPH J. BERNARD
Acting United States Attorney

/s/ Kimberley Crockett
Kimberley Crockett

CERTIFICATE OF SERVICE

I, Kimberley D. Crockett, Assistant United States Attorney for the Northern District of West Virginia, hereby certify that on May 6, 2025, the foregoing UNITED STATES' MOTION IN LIMINE TO PROTECT IDENTITY OF VICTIMS was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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By: /s/ Kimberley D. Crockett
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